

Emailed Testimony from Cassie Burdyshaw 2/27/2025

Dear Chair and Members of the House Committee on Environment:

I recently spoke with Commissioner Levine about avian influenza-related risks stemming from bait piles. I am sharing the written response from Commissioner Levine below. I want to highlight three additional points:

1. Because bait piles are unregulated, they may even include infected domestic or wild bird carcasses.
2. The precautionary principle supports putting protections into place based on clinical reasoning such as Commissioner Levine's, even in the absence of specific studies.
3. Birds of prey that feed off of bait piles, such as red-tailed hawks, have tested positive for H5N1 in [Vermont](#), and, as Commissioner Levine highlights below, defecation by infected birds at bait sites facilitates transmission.

Here are Commissioner Levine's words:

I have been asked to comment on transmission of avian influenza (H5N1) in the wild among animal populations, and possible linkage to the use of bait piles.

Avian influenza is highly transmissible in wild bird populations, so any activity that increases the probability of birds congregating together (such as raptors eating from bait piles) would be expected to facilitate transmission in susceptible populations. Likewise, transmission can occur to a bird if a prior bird has defecated in the area. In light of the fact that wild mammalian species (including a bobcat in Vermont) have been documented to acquire H5N1, it is at least theoretically plausible that transmission to mammals can occur as well should a mammal feed from the pile.

Obviously if infected poultry were part of the bait this might lead to disease transmission as well.

It is also strongly suspected (and there are rules to this effect in other states to prohibit feeding of wild moose or deer) that the gathering of animals at feeding sites can lead to the transmission of infectious diseases among them. I know of no specific references to avian influenza, or influenza in general.

I am not aware of studies that specifically address the above theoretical scenarios. Therefore, these thoughts should be viewed as the product of clinical reasoning and not necessarily supported by scientific literature or data. As such, the Vermont Department of Health is not taking a position on this issue.

Best,
MAL

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Thank you for your attention to this issue.

Sincerely,

Cassie

Cassie Burdyshaw
Vermont State Director

